

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

Precision Lift, Inc.

Debtor.

Case No. 11-05730-hb

Chapter 7

**MOTION IN SUPPORT OF *PRO HAC VICE* APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Rosa A. Shirley be admitted *pro hac vice* in the above case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02):

Prior to filing this Motion, I conferred with the Chapter 7 trustee herein who has indicated that he does not intend to oppose the motion. Prior to filing this Motion I also attempted to confer with debtor's counsel but was unable to do so for the following reason(s): No response has been received to e-mail communication.

s/ Däna Wilkinson

Däna Wilkinson

Local Counsel

District Court I.D. No. 4663

365-C East Blackstock Road

Spartanburg, SC 29301

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October 14, 2011

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In re: ) Case No. 11-05730-hb  
)  
Precision Lift, Inc. ) Chapter 7

**APPLICATION/AFFIDAVIT FOR *PRO HAC VICE* ADMISSION**

- (1) Name. Rosa A. Shirley
- (2) Residence. I reside in the following state: Texas
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Baker & McKenzie LLP  
2001 Ross Avenue, Suite 2300  
Dallas, Texas 75201  
(214) 978-3000 (Telephone)  
(214) 978-3099 (Facsimile)  
Rosa.Shirley@bakermckenzie.com

- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the State of Texas where I regularly practice law. Attached is my certificate of good standing.
- (6) Additional Bar Membership. I have been admitted to practice before the following courts. By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

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<sup>1</sup>This District 1 maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

Courts	Date Admitted	Good Standing
The United States Supreme Court	01/24/11	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
United States District Court for the Northern District of Texas	01/07/11	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The Supreme Court of Texas	11/03/06	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ..... ☐ Yes ☒ No
- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  
☐ Yes ☒ No
- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  
☐ Yes ☒ No
- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  
☐ Yes ☒ No
- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  
☐ Yes ☒ No
- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name:	Däna Wilkinson
Firm Name:	Law Office of Däna Wilkinson
Street Address or Post Office Box:	365-C East Blackstock Road
City, State, and Zip Code:	Spartanburg, SC 29301
Telephone Number:	(864) 574-7944
E-Mail Address:	danawilkinson@danawilkinsonlaw.com


I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel is also associated with the undersigned in this case.  
David W. Parham, Baker & McKenzie LLP, 2001 Ross Ave., Suite 2300, Dallas, TX 75201
- (14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties:  
Flexible Lifeline Systems



Signature of Applicant

Sworn to and subscribed before me  
this 27<sup>th</sup> day of September, 2011.

  
A Notary Public  
of the State of Texas

My Commission expires: 5/2/15



**U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**CERTIFICATE OF GOOD STANDING**

I, Karen Mitchell, Clerk of the U.S. District Court for the Northern District of Texas, certify that the attorney named below is admitted to practice before this court and is currently in good standing:

**Rosa A. Shirley**

Bar Number:

Date of Admission:

**24056313**

**01/07/2011**

Witness my official signature and the seal of this court.

Dated: 09/20/11

Karen Mitchell,  
Clerk of Court

By: 

Deputy Clerk



Fee: \$15.00